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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

Case No.:
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - - x

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Continued Videotaped Deposition of
GHISLAINE MAXWELL, the Defendant herein,
taken pursuant to subpoena, was held at
the law offices of Boies, Schiller &
Flexner, LLP, 575 Lexington Avenue, New
York, New York, commencing July 22,
2016, 9:04 a.m., on the above date,
before Leslie Fagin, a Court Reporter
and Notary Public in the State of New
York.

- - -

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2 APPEARANCES:

3 On Behalf of the Plaintiff:

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On Behalf of Defendant:

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22 Denver, Colorado 80203

BY: JEFFREY S. PAGLIUCA, ESQUIRE

23 LAURA A. MENNIGER, ESQUIRE

24

Also Present:

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THE VIDEOGRAPHER: This is DVD No. 1, Volume II, of the continued video recorded deposition of Ghislaine Maxwell in the matter Virginia Giuffre against Ghislaine Maxwell, in the United States District Court, Southern District of New York.

This deposition is being held at 575 Lexington Avenue, New York, New York, on July 22, 2016 at approximately 9:04 a.m.

My name is Rodolfo Duran. I am the legal video specialist. The court reporter is Leslie Fagin, and we are both in association with Magna Legal Services.

Will counsel please introduce themselves.

MR. BOIES: This is David Boies, of Boies, Schiller & Flexner, counsel for plaintiff.

MS. SCHULTZ: Meredith Schultz, from Boies Schiller & Flexner, counsel for plaintiff.

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MR. EDWARDS: Brad Edwards, also
representing the plaintiff, Virginia
Giuffre.

5

MR. POTTINGER: Stan Pottinger,
also representing the plaintiff.

7

MR. CASSELL: Paul Cassell, from
Salt Lake City, Utah, also representing
Ms. Giuffre.

10

MR. PAGLIUCA: Jeff Pagliuca and
Laura Menninger, on behalf of Ms.
Maxwell.

13

And Ms. McCawley has also entered
the room, and we have an assistant from
Boies Schiller from the Fort Lauderdale
office here today as well today.

17

THE VIDEOGRAPHER: Will the court
reporter please swear in the witness.

19

G H I S L A I N E M A X W E L L,

20

called as a witness, having been duly

21

sworn by a Notary Public, was

22

examined and testified as follows:

23

EXAMINATION BY

24

MR. BOIES:

25

Q. Good morning, Ms. Maxwell. [REDACTED]

[illegible]

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2 [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

5

Category	Percentage
Total	50%
By Age Group	
18-29	55%
30-49	50%
50-69	45%
70+	40%

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A horizontal bar chart titled 'U.S. should take action to reduce greenhouse gas emissions' comparing responses by age group and gender. The y-axis lists age groups: 18-29, 30-49, 50-69, 70+, and 'All'. The x-axis shows percentages from 0 to 100. For each age group, there are two bars: a blue bar for 'Men' and an orange bar for 'Women'. The data is as follows:

Age Group	Men (%)	Women (%)
18-29	85	85
30-49	80	80
50-69	75	75
70+	70	70
All	75	75

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2 MR. PAGLIUCA: Objection to form
3 and foundation.

4 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 MR. PAGLIUCA: Objection to form
9 and foundation.

10 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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2 only area that the witness was precluded
3 from talking about in the first
4 deposition. So that's where we're at.

5 MR. BOIES: I think that directly
6 misreads the judge's order, including
7 where it says: Defendant is ordered to
8 answer questions relating to defendant's
9 own sexual activity with or involving
10 Jeffrey Epstein, with or involving
11 plaintiff, with or involving underage
12 females, involving or including massage
13 with individuals defendant knew to be or
14 believed might become known to Epstein.

15 MR. PAGLIUCA: All of it is
16 preceded by the word sexual activity.

17 MR. BOIES: I think your point of
18 view is an interesting one, but we will
19 see what the judge rules on it.

20 BY MR. BOIES:

21 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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2 and foundation.

3 A. [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

8 MR. PAGLIUCA: Objection to form

9 and foundation.

10 A. I don't know.

11 Q. Did any of them give you massages?

12 A. No.

13 Q. [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

17 MR. PAGLIUCA: Objection to form

18 and foundation. Asked and answered.

19 A. No.

20 Q. Were they ever in the Virgin

21 Islands?

22 MR. PAGLIUCA: Objection to form

23 and foundation.

24 A. No.

25 [REDACTED] [REDACTED]

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[illegible]

24 MR. PAGLIUCA: Objection to form
25 and foundation.

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2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 Q. Were you aware of the presence of
10 sex toys or devices used in sexual activities
11 in Mr. Epstein's Palm Beach house?

12 [REDACTED]

13 [REDACTED]

14 A. No, not that I recall.

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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2 [REDACTED]

3 [REDACTED]

4 [REDACTED] [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED] [REDACTED]

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2 it to something in the case.

3 MR. BOIES: I think it's tied, but
4 if you instruct her not to answer, it
5 goes into the --

6 MR. PAGLIUCA: Meat grinder.

7 BY MR. BOIES:

8 Q. [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED] [REDACTED]

14 A. Can you repeat the question?

15 Q. [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 MR. PAGLIUCA: Same objection.

21 A. No.

22 Q. Other than yourself and the blond
23 and brunette that you have identified as
24 having been involved in three-way sexual
25 activities, with whom did Mr. Epstein have

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2 sexual activities?

█ [REDACTED] [REDACTED]

█ [REDACTED]

5 A. I wasn't aware that he was having
6 sexual activities with anyone when I was with
7 him other than myself.

8 Q. I want to be sure that I'm clear.
9 Is it your testimony that in the 1990s and
10 2000s, you were not aware that Mr. Epstein
11 was having sexual activities with anyone
12 other than yourself and the blond and
13 brunette on those few occasions when they
14 were involved with you?

15 A. That is my testimony, that is
16 correct.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED]

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2 ever see [REDACTED]?

3 A. I don't recall ever seeing her.

4 Q. [REDACTED]

5 [REDACTED]

6 A. [REDACTED]

7 Q. Did [REDACTED] ever engage in any
8 sexual activity with Mr. Epstein?

9 A. I wouldn't know. I would assume
10 not, but I don't know.

11 Q. Do you have any reason to believe
12 that Mr. Epstein engaged in any sexual
13 activity with [REDACTED]?

14 MR. PAGLIUCA: Objection to form
15 and foundation.

16 A. I wouldn't know.

17 Q. Did you ever give a massage to
18 anyone other than Mr. Epstein at any of Mr.
19 Epstein's properties?

20 A. First of all, I never said I gave
21 Mr. Epstein a massage.

22 Q. I will ask that question if you
23 want, but I was focusing on people other than
24 Mr. Epstein right now.

25 A. I don't give massages.

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2 Q. Let's just tie that down. It is
3 your testimony that you've never given
4 anybody a massage?

5 A. I have not given anyone a massage.

6 Q. You never gave Mr. Epstein a
7 massage, is that your testimony?

8 A. That is my testimony.

9 Q. You never gave [REDACTED] a
10 massage is your testimony?

11 A. I never gave [REDACTED] a
12 massage.

13 Q. Did you, or to your knowledge,
14 Mr. Epstein pay for [REDACTED] to go to
15 Thailand?

16 MR. PAGLIUCA: Objection to form
17 and foundation.

18 A. I am not aware.

19 Q. Do you know whether [REDACTED]
20 went to Thailand?

21 A. I have no knowledge of anything
22 like that.

23 Q. Did you ever give anyone
24 instructions as to how to give a massage?

25 MR. PAGLIUCA: Objection to form

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2 closed.

3 If there are questions that I have
4 instructed the witness not to answer and
5 it later turns out the judge disagrees
6 with my characterization, we will be
7 back to revisit it, but we are done as
8 far as I'm concerned.

9 MR. BOIES: The deposition is not
10 closed. There are a number of
11 instructions not to answer. I think it
12 is a fair point that if the court were
13 to conclude that none of the questions
14 that have been instructed need to be
15 answered, we're not going to be
16 continuing the deposition, barring some
17 additional information coming to light.

18 MR. PAGLIUCA: I think we agree
19 then.

20 THE VIDEOGRAPHER: The time is 2:51
21 p.m., and we are going off the record.

22 (Time noted: 2:51 p.m.)

23

24

25